

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

EARTHA AUGUSTIN,

Plaintiff,

-vs-

ENLARGED CITY SCHOOL DISTRICT OF
NEWBURGH, et. al, etc.,

Defendants.

Civil Action No. 07 Civ 5709 (WCC)

SECOND SET OF ADDITIONAL
INITIAL DISCLOSURES BY
DEFENDANTS

Defendants, by their attorneys, Shaw, Perelson, May & Lambert, LLP, as and for their Additional Initial Disclosures pursuant to Fed. R. Civ. P. 26 (a) (1) hereby provide the following information in the order provided by Rule 26 (a) (1):

A. Individuals likely to have discoverable information concerning the lawful basis for the actions of the defendants of which the plaintiff complains:

30. Beverly Johnson, Assistant Principal, Newburgh ECSD
31. Ralph Malloy, Assistant Principal, Newburgh ECSD
32. Margaretta St. Clair, Long Term Leave Replacement, Newburgh ECSD
33. Rikki Pearson, Teaching Assistant, Newburgh ECSD

The defendants reserve their right to supplement this list.

B. Documents, etc. in possession of defendants that defendants may use to support their claims or defenses.

1. Applications and portions of personnel records of Beverly Johnson
2. Applications and portions of personnel records of Ralph Malloy
3. Applications and portions of personnel records of Margaretta St. Clair.

4. Dr. Winchester-Vega treatment records of Plaintiff.

The defendants reserve their right to supplement this list.

Dated: August 26, 2008

SHAW, PERELSON, MAY & LAMBERT, LLP
Attorneys for Defendants

by: _____ /S _____
Mark C. Rushfield, Esq. (MCR 0231)
Of Counsel to the Firm
21 Van Wagner Avenue
Poughkeepsie, New York 12603
845/486-4200